



WILLIAM P. DENI, JR.
Director

Gibbons P.C.
One Gateway Center
Newark, New Jersey 07102
Direct: (973) 596-4853 Fax: (973) 639-8373
wdeni@gibbonslaw.com

June 3, 2024

VIA ECF

Honorable Tonianne J. Bongiovanni, U.S.M.J.
United States District Court
District of New Jersey
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street
Trenton, New Jersey 08608

Re: *Arbutus Pharma Corp., et al. v. Pfizer Inc., et al.*
Civil Action No. 23-1876 (ZNQ) (TJB)

Dear Judge Bongiovanni:

This firm, along with Paul Hastings LLP, represents BioNTech SE in the above-referenced action. We write on behalf of all Defendants with regard to Plaintiffs' Motion to Compel Production of Documents and accompanying Exhibits, filed under seal on May 29, 2024 (ECF No. 73).

Pursuant to L. Civ. R. 78.1(a), we understand that our responsive submission is due on June 17, 2024. If this understanding is incorrect, we will be prepared to address the due date for our responsive submission during our telephonic status conference scheduled for Wednesday, June 5 at 3:00 p.m.

We also respectfully request the Court's guidance as to Your Honor's usual preferences for submissions from the parties that request permission to file a discovery motion prior to the filing any such motion. *See* Lite, N.J. Federal Practice Rules at 804 (Gann, 2024).

Respectfully submitted,

s/ William P. Deni, Jr.
William P. Deni, Jr.

cc: All counsel of record (via ECF)